

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

OLES ENVELOPE, LLC, et al.,

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Plaintiffs,

*

v.

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Civil Action No. WMN 02-2017

GTD COMPANY, INC., et al.,

*

Defendants.

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JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiffs, Oles Envelope, LLC ("Oles") and Oles Envelope Corporation ("OEC"), and the Defendants, GTD Company, Inc., Harold Robinson and David Oechsle ("Defendants"), by undersigned counsel, hereby move the Court to modify the deadlines provided in the existing Scheduling Order for the following reasons:

1. The parties' discovery has been further delayed by the failure of the recipients of third party subpoenas to timely respond to subpoenas served by Oles and Defendants. At the present time, Defendants are currently awaiting a response from First Union Bank and Chadwick Consulting, Inc.

2. The parties have had difficulties scheduling the depositions of the numerous fact witnesses in this case. At present, Defendants are awaiting additional deposition dates for the continuation of the deposition of the president of Oles and other Oles employees and are contacting additional fact witnesses whose names have been discovered recently during the course of discovery.

3. On April 25, 2003, Defendants received from Oles a large amount of documentation regarding financial information for a three-year period, which information must be reviewed and analyzed by Defendants' experts. None of the depositions of the experts has

been noted due to the experts' need for additional time to review the newly obtained financial information. In addition, as of April 25, 2003, Oles has made available for inspection a large amount of additional documents, which are located in the Oles manufacturing facility. Counsel for Defendants will need additional time to review and copy those documents.

4. Thus, due to the discovery of additional witnesses, the difficulty in scheduling the large number of depositions, the delay in obtaining documents requested in discovery, and the need for the experts and counsel in this case to review key documents, the parties jointly request additional time to complete discovery.

5. The parties request that the deadlines set forth in the Scheduling Order be revised as follows:

Discovery deadline; Status Report – June 20, 2003

Requests for admission – June 20, 2003

Dispositive pretrial motions deadline – July 21, 2003

6. None of the parties will be prejudiced by the proposed modification of the deadlines.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court modify the deadlines in the existing Scheduling Order.

Dated: April 30, 2003

/s/
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Harold Robinson and David Oechsle

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of April 2003, a copy of the foregoing ***Joint Motion to Modify Scheduling Order*** was served via first class mail, postage prepaid to:

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